

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 20-cr-20477

v.

Hon. Judith E. Levy

Jostin Arthur Desco,

Defendant.

\_\_\_\_\_ /

**UNITED STATES' SENTENCING MEMORANDUM**

Jostin Arthur Desco has an insatiable sexual interest in young children. He enjoys manipulating them, blackmailing them, and sexually assaulting them. Desco has no limits to his conduct. No child is too young (his youngest victim is 3 years old), no relationship is too sacred (he sexually assaulted the 7-year-old son of his best friend and sexually exploited that child's older brother), and no amount of suffering too much (he speaks with disdain about his blackmail victims, even as they weep and threaten suicide as a result of his conduct). As Desco described himself to other sex offenders, "Yes I am sick and yes I am a monster but news flash we all are. We like having sex with children. Just own it."

Nor could the Court hope that prison or treatment would serve as a wake-up call or a meaningful deterrent to Desco's conduct. Desco previously served several years in prison for child pornography related crimes and completed sex offender

treatment during his period of parole. Yet just four days after being released from a halfway house, Desco created an account on a Russian-based website that he used to trade child pornography. In fact, much of the criminal conduct in this case occurred while Desco was on parole for his prior offense. Desco's sexual exploitation of children has been a continuous part of his life, from age 15 to the present. A psychological report attached to his sentencing memo identified him as a pedophile, a title he acknowledges. He has repeatedly acted on his sexual interest in children, even in the face of significant consequences to the rest of his life. He has shattered friendships and imposed life-long negative consequences in the dozen children he has victimized. The guidelines call for him to spend the rest of his life in prison. The government requests a sentence of 60 years, a sentence necessary to protect the public from Desco and hold him accountable for the devastation he imposed on his victims.

## **I Desco's Criminal History**

This case involves several separate child sexual exploitation investigations that each identify Defendant Jostin Arthur Desco in the production, distribution, and possession of child pornography. Each investigation is described in the next section, but first a bit of Desco's history is in order.

On August 17, 2011, after a six-month investigation into a peer-to-peer network used in the trafficking of child pornography, law enforcement executed a search warrant at the defendant's home in Sault Ste. Marie, Michigan. (PSR ¶ 91). Desco, who was present during the search warrant execution, admitted to child pornography crimes. Desco admitted to first seeking out child pornography two years prior. The defendant estimated he accessed child pornography every other day, stored between 1,000 and 2,000 such images, traded child pornography with a dozen other people, and used email and peer-to-peer networks to traffic in child sexually abusive material. (*Id.*).

Desco then confessed to additional crimes. Desco admitted to taking non-sexual pictures of his 7-year-old cousin. Agents found an email from Desco to one of his child pornography trading partners in which Desco admitted to sexually assaulting the cousin during a sleep over. (*Id.*). To a different peer-to-peer user, Defendant confessed to sexually assaulting a 10-year-old friend of his sister's at a separate sleep over. (*Id.*).

Desco pleaded guilty to trafficking in child sexually abusive material. Prior to his sentencing hearing, Desco said: “At the time, I didn’t realize how much trouble I could be in if I got caught. If I would have known, I never would have done it. And I can honestly say I will NEVER do it again.” (PSR ¶ 91). On July 6, 2012, the court sentenced Desco to three to seven years custody. Desco performed poorly in prison, racking up a total of five citations. (*Id.*).

On March 7, 2017, the Michigan Department of Corrections paroled Desco. About 70 days later, Desco was found in violation of the terms of parole for possessing an internet-capable device, possessing sexually stimulating material, failing to complete outpatient sex offender therapy, and possessing child sexually abusive material. Specifically, the defendant had multiple computing devices and information about child pornography websites, including codes for dark websites used for child sexual exploitation. Desco provided the following statement regarding the Dark Web materials:

They are dark web sites that I got from a guy in prison. I haven't used them yet. They are for the future. I have been very stressed out lately because I have to move. My mom and my little sister are going to be moving here and I have to find another place to live. I have been doing really well in therapy. You can ask my therapist. I haven't acted on any of my thoughts yet.

Desco was sentenced to serve six months in a halfway house. While at the halfway house, Desco completed both sex offender treatment and substance abuse group therapy. He left the halfway house on December 21, 2017.

On March 7, 2019, the defendant was discharged from parole. As a result of this conviction, Desco is required to register as a sex offender.

## **II**

### **Relevant Factual and Procedural History**

#### **A. The IMGSRG Investigation (Count 9)**

On January 15, 2018, less than a month after Desco had been released from the halfway house, an analyst with the Ontario Provincial Police (OPP) observed a posting on IMGSRG, a Russian-based web hosting service known for child pornography distribution. The IMGSRG user **sandman13** posted two sets of images in two folders. The first folder had 2 images of a known child pornography series involving a naked prepubescent boy using a sex toy. That folder was called “My favorite boy.” The second folder had a picture of a mother and her four children, as well as several images of the toddler-aged girl from that family. The title of that folder was “My baby (please tribute).” In the world of child sexual exploitation, a “tribute” request seeks to have other individuals ejaculate on the image provided. None of those images were of child pornography. As explained in more detail below, this same family would be victimized repeatedly by Desco.

The OPP analyst’s investigation revealed that the sandman13 user posted the images from an IP address that resolved to Flint, Michigan. IMGSRG identified two email addresses associated with sandman13, including iamsandman13@yahoo.com. Subpoenas followed and eventually identified that

the user of the Yahoo! account accessed the internet through IP addresses at three different residences: (1) Desco's father's residence; (2) Desco's mother's home; and (3) Desco's best friend's home. Desco lived at these three different locations after being released from prison in March 2017. (PSR ¶ 100).

A search warrant for the Yahoo! account revealed several selfie-style pictures of Desco, as well as numerous emails identifying the user of the account as Desco. Most importantly here, the Yahoo! account contained an email from IMGSRG confirming the creation of the sandman13 account on Christmas Day 2017 (just *four* days after Desco had been released from the halfway house).

#### **B. The San Antonio Investigation (count 10)**

In October 2018, a Toronto Police Service officer was doing undercover work on Tor (an anonymous network used to access the dark web). In the "Naturalist/Nude" group on a site on Tor, someone using the moniker **therealsandman** made a post entitled "KiK friend shared littler brother." The post read as follows: "Been chatting with a boy who claims to be 16 and was able to get him [to] share his little brother. Not much but it's a stat (sp) Hope everyone enjoys it." The post included hyperlinks to child pornography images of a diaper-aged child. The Toronto investigator recognized the naming convention of these images and the video as being consistent with the naming convention used by KiK. This information coupled with the title of the post by therealsandman (i.e., "KiK

user...”) led the investigator to reach out to KiK for assistance. KiK confirmed that the images came from their platform and identified the KiK user therealsandman as “mclily13” using an email address of hi5josie.k@gmail.com.

Subpoenas to Google and Verizon followed. The IP address used by the hi5josie email account resolved to Desco’s mother’s house. Meanwhile, Toronto investigators identified the KiK user who sent the images to Desco as a teenage boy from a suburb of San Antonio, Texas. The child depicted in the videos was rescued, and he and his brother interviewed. The older brother admitted to creating the child pornography after engaging in conversations with KiK user “mc something.” The “mclily” persona would come into play in other investigations, as described below.

### **C. The Tor International Investigation (counts 1-8)**

The most significant part of this case stems from an investigation led by an international team of law enforcement officers attempting to unravel child sexual exploitation crimes over the Tor Network. That team’s investigation showed a user known as **therealsandman** distributing child pornography on approximately 9 dark websites dedicated to the sexual abuse of children. A review of therealsandman’s posts on those websites revealed several unique images and videos of child pornography.

### **Minor victim #1**

The Boston team identified 34 images and 14 videos of a prepubescent boy tied to therealsandman. Some of those videos and images appeared in a September 19, 2019, post made to the group Boytown entitled “sleeping beauty.” The post read as follows: “Id like to introduce everyone to ‘[Minor Victim #1’s true name].’ He is 7 years old. Here are a few short videos of him asleep + 4 pics. Hope everyone enjoys. More to come soon.” In one of the videos, Desco is seen performing oral sex on the 7-year-old child. The naming convention of the images and video suggest a September 2019 creation date.

The investigation by the international team identified therealsandman as Desco. Officers then learned MV-1 was the youngest son of Desco’s best friend, who was in fact 7 years old when Desco sexually assaulted him. MV-1’s mother is Desco’s closest friend and someone who allowed Desco to live with her when no one else would. MV-1’s mother and four children were the subject of the IMGSRG post identified in subsection A above.

### **Minor Victim #2**

Desco’s betrayal of his best friend and her family did not end there. Minor Victim #2 is the older brother of MV-1, and the oldest son of Desco’s best friend. Minor Victim #2 disclosed that he was befriended on Snapchat by who he thought was a 15-year-old girl from Ohio named “Lily McCloud.” The girl sent MV-2



multiple nude pictures and images. The girl sought nude images and videos of MV-2, to which he complied. “Lily McCloud” made increasingly demanding requests, including that MV-2 create nude images of his little brother and that MV-2 engage in sex acts with his little brother and little sister. MV-2 refused to engage in sex acts with his siblings.

When MV-2 failed to comply with the demands made by Desco (a.k.a., Lily McCloud), Desco began blackmailing MV-2 by threatening to tell MV-2’s mother about the pictures unless MV-2 complied. Desco (as Lily) even sent MV-2 a screenshot of MV-2’s mother’s Facebook account and told MV-2 that Lily would send the nude photos to that account. MV-2 blocked Lily on Snapchat, but she reappeared under different Snapchat accounts including “don’tignoreme131” and “itellurmom[MV-2’s true name].” Desco, in short, tortured this teenage boy.

Distraught by the blackmail, MV-2 sought to take his mother’s phone to avoid her learning of the images. When his mother objected, MV-2 disclosed what was happening to him by “Lily.” Still unaware that Desco was Lily, MV-2’s mother turned to her best friend (Desco) for advice. Desco advised her not to tell anyone as MV-2 would likely be arrested. Desco’s manipulation and blackmail of MV-2 lasted for months.

### **Minor Victim #3**


The international team also recovered images and videos of a child called Kasper, who is referred to as Minor Victim #3. On August 31, 2020, the Tor user **therealsandman** again posted on the website Boystown. The post was called “my 8yo boyfriend” and it read: “Today I proudly present to you Kasper. He is 8 years old he is gay, and he loves to show off for me. He was previously posted here [link provided].” The link provided by therealsandman led to 15 videos and 54 images (not all of which are child pornography) of a boy approximately 8 years old displaying his genitalia and masturbating. The naming conventions on these images/videos suggest creation dates in August 2020. Polish police believe they have identified Kasper, but he has not yet been interviewed.

### **Minor Victim #4**

In another website on Tor, **therealsandman** posted a message called “13yo [MV-4’s true name].” That post read: “I have been able to convince this boy that I am a 15 yo girl and ... have been sexting him for quite some time now. These are all of the ones he has sent me. Not much mostly dick picks hope to have more soon. If people enjoy him I’d be happy to provide more.” As with the other children, therealsandman provided links that showed child pornography of a boy, approximately 13 years old, masturbating and displaying his genitals.


## Other Posts by Desco

Therealsandman's other posts showed a shocking disregard for the suffering of his victims. In a series of threads from September 2018, Desco solicited others for advice on blackmailing victims:

 TheRealSandman  
created this topic  
Sep 19, 2018 05:41

Over the past few weeks I have been communicating with a 12 year old boy while pretending to be. Young girl. I sent him. Few pictures of "me" (aka random girls) and he returned the favor with a few dick pick. I then attempted to use his pictures to blackmail him and said I would share them with all of his friends if he didn't do what I said. He begged and pleaded for me to delete them. I explained the rules of my little game and then things went wrong. He began to cry (I only know this because I had him video chat with me (while I covered the camera to avoid showing my face to him) and had him say "I love you Daddy. I promise I will do what you tell me to" but he was whining and sniffing and I could tell he was crying. I then began to feel bad for him (damn my pedo heart) but was already committed. As I tried to tell him what I wanted him to do he started freaking out saying he was going to jump off the roof of his house and kill himself, I didn't believe him but backed off just in case. I tried to calm him down but he refused. After several more minutes he said he was going to kill himself and goodbye forever then blocked me. I know he did not kill himself because I have another profile and saw his recent activity. And I highly doubt he will tell out of embarrassment. Please do not comment about any legal concerns because I have already taken all precautions. While talking to this boy I used a fake phone and fake social media with fake names. After talking with him I deleted all accounts and destroyed the phone and got rid of it, so that is not a concern. The reason for this post is to ask for advice in my future blackmail attempts because clearly this one was a fail. I would also like to hear your blackmail/boy bending success stories.

Many of the fellow users rebuked Desco, suggesting that blackmail was a bridge too far even for this group dedicated to the sexual exploitation of children. Desco was unmoved, writing:

 TheRealSandman  
Sep 20, 2018 06:07

I'm sorry to anyone that got offended my by tactics but let me remind you all what we are. We are men that enjoy forcing boys to have sex with us and yes manipulation is a form of force. No boy wants to be molested my an adult man until we convince them to do it. You may think these boys want this but in reality they only think that either out of fear (and I don't just mean threats, fear of disappointing someone they look up to) or by retraining their underdeveloped brains. So before you call me "sick" or a "monster" or anything along those lines let me stop you. Yes I am sick and yes I am a monster but news flash we all are. We like having sex with children. Just own it.

Desco's blackmail of young boys continued, as indicated in the next section.

### **Identifying Desco as therealsandman on Tor**

The international team scoured all of therealsandman's posts. In one of the posts, he admits to being active on IMGSRG. IMGSRG identified a person with the same username and provided the information about him, including email addresses. Those email addresses—and a phone number associated with one of them—used IP addresses at Desco's mother's home.

### **D. The Detroit Investigation (the stipulated offenses beyond the indictment)**

Finally, as a result of all of these leads converging together in the Detroit Field Office of the Department of Homeland Security, agents executed a search warrant at Desco's father's home on September 11, 2020. Agents recovered a cellular phone but have been unable to access it due to encryption on the device. However, agents executed search warrants on Desco's Snapchat account (the one used to exploit MV-2), Gmail accounts, and a Facebook account. A review of Desco's Facebook account—using his moniker of Lily McCloud—revealed additional victims.

*Minor Victims #5 and #6.* Minor Victim #5 reported to being 12 years old when contacted by "Lily McCloud" on Facebook. MV-5 believed McCloud was a teenage girl interested in him romantically. At McCloud's insistence, MV-5 produced images and videos of himself masturbating. Another boy whom MV-5

knew, known here as Minor Victim #6, was also victimized by Desco using the Lily McCloud Facebook page. Desco even sent MV-5 child pornography of MV-6. Both boys fell victim to Desco's manipulation and deceit. The repercussions for MV-6 were significant. He had to be hospitalized for 10 days due to suicidal thoughts. Both of these victims reside in Northern Michigan.

*Minor Victim #7.* Minor Victim #7 is also from Northern Michigan. He was 17 years old when targeted by Desco. MV-7 has learning disabilities such that he could not be interviewed by law enforcement. However, his mother identified him in child sexually abuse material produced at the behest of Lily McCloud.

*Minor Victims #8 and #9.* Minor Victim #9 was a 13-year-old boy when befriended over Facebook by Desco (again, using the Lily McCloud account). Desco enticed MV-9 to produce images of himself and his little sister, Minor Victim #8. MV-8 was just three years old at the time of her victimization. When Desco demanded additional images and videos, MV-9 blocked him on Facebook. Then the blackmail started. Additional accounts reached out to MV-9 threatening to expose him to the police and his family if MV-9 did not comply with Desco's demands for additional pictures.

### **E. Desco Pleads Guilty**

Desco pleaded guilty to one count of production of child pornography and one count of commission of a sex offense by a registered sex offender. His mandatory minimum is 35 years in custody, the statutory maximum is 60 years.

### **III Sentencing Factors**

In 18 U.S.C. § 3553(a), Congress provided the objectives and factors that courts are to consider when imposing a sentence. The United States addresses the most relevant § 3553(a) factors below.

#### **A. Nature and Circumstances of the Offenses, 18 U.S.C. § 3553(a)(1)**

Sex crimes against children leave an indelible mark on victims. Child pornography crimes result in the victims being repeatedly exploited, by a variety of different offenders, in perpetuity. As Congress found, “child pornography permanently records the victim’s abuse, and its continued existence causes the child victims of sexual abuse continuing harm by haunting those children in future years.” Child Pornography Prevention Act of 1996, Pub.L. No. 104-208, § 121, 110 Stat. 3009, 3009-27 (1996). Beyond re-victimizing the children depicted in the videos and images of child pornography, these crimes also “inflames the desires of . . . pedophiles . . . who prey on children, thereby increasing the creation of and distribution of child pornography and the sexual abuse and exploitation of actual

children who are victimized as a result of the existence and use of these materials.”

*Id.*

Here, the nature and circumstances of Desco’s crimes justify an enormous sentence for at least three reasons. First, Desco betrayed those closest to him in order to sexually exploit children. The mother of MV-1 and MV-2 welcomed Desco into her home when virtually everyone else in his life would not. Desco repaid her generosity by sexually assaulting her youngest son (MV-1), posting pictures of her youngest daughter (the child who Desco asked other offenders to “tribute”), and manipulating her older son (MV-2) into creating and sharing child pornography of himself. Desco blackmailed MV-2 and taunted him over Snapchat. When MV-2 finally disclosed the abuse to his mother, Desco convinced her not to go to the police so that MV-2 would not be arrested. Desco’s manipulation and exploitation of this whole family is shocking even to the most seasoned investigators of child sex crimes.

Second, Desco’s sexual interest in children has been a consistent theme throughout his life. Desco acknowledged viewing and collecting child pornography as a 15-year-old, eventually getting arrested and convicted at age 17. (PSR ¶ 91). Desco admitted—through emails—to sexually assaulting two girls (ages 7 and 10) prior to the arrest. The following timeline starts after Desco’s release from prison on his first case:

- March 7, 2017 – Desco released from prison;
- May 11, 2017 – Desco violates probation, including obtaining codes for dark websites used for child pornography;
- December 21, 2017 – Desco released from halfway house;
- December 25, 2017 – Desco registers sandman13 account on IMGSRC;
- January 15, 2018 – Desco posts child pornography on IMGSRC as well as family picture of MV-1, MV-2, and their little sister;
- September 2018 – Desco brags on Tor about blackmailing a 12-year-old boy who cried a lot as he contemplated suicide;
- October 2018 – Desco posts on Tor about the San Antonio victims who he manipulated using the Lily McCloud persona;
- March 7, 2019 – Desco completes parole;
- September 2019 – Desco posts child pornography of MV-1, including a video of Desco performing oral sex on the 7-year-old child;
- September 2019-August 2020 – Desco manipulates, exploits, and blackmails MV-2;
- August 31, 2020 – Desco posts pictures of MV-3 (the 8-year-old from Poland) on Tor;
- September 11, 2020 – Desco arrested after a search warrant executed at his home.

In total, Desco convinced at least a dozen children to create child pornography of themselves and send it to him in less than three years. This, of course, assumes that law enforcement recovered all of the evidence against Desco. Experience and common sense suggest this is simply not the case. The only reason Desco stopped his conduct is because law enforcement finally caught up with him.

Third, Desco's techniques in exploiting his victims further separate him from most offenders. Desco manipulated and blackmailed these vulnerable children. That he did so using fake identities and the Tor network showed that he attempted to learn from his prior arrest and mistakes.



At bottom, the nature and circumstances of the offenses here—including betrayal, manipulation, blackmail, and repetitive hunting by Desco—justify a guidelines sentence.

**B. History and Characteristics of the Defendant, 18 U.S.C. § 3553(a)(1)**

The history and characteristics of the defendant likewise support the government’s requested sentence. The psychological report attached to Desco’s sentencing memorandum reaches the conclusion that Desco is a pedophile. Desco acknowledges this much and appears to concede that he would not change if given another opportunity. While the report suggests that Desco maybe bipolar, its foundation for such a finding seems weak. Specifically, that Desco describes himself as having times of energy and action—rather than depression and despair—could amount to a finding of bipolar. But certainly more study is in order. What is not in dispute, however, is Desco’s sexual attraction to children and his willingness to act on that attraction at any moment.

Beyond the diagnosis and academic reports is evidence of Desco’s cruel character. Desco told other sex offenders that he essentially did not care about a 12-year-old boy who wept while being blackmailed by Desco. Desco’s concern, incredibly, was how to be more efficient and effective as a blackmailer. When the other sex offenders chastised him for blackmailing victims—because even they believed Desco’s tactics were too severe—Desco defended himself by noting,

“before you call me ‘sick’ or a ‘monster’ or anything along those lines let me stop you. Yes I am sick and yes I am a monster but news flash we all are. We like having sex with children. Just own it.” Desco’s repeatedly cruel behavior to his victims show his true character.

Perhaps worth noting, for what it is worth to him, Desco is honest. In the post to his fellow Tor users, Desco acknowledged the crimes he and the others committed. Desco wrote, “We are men that enjoy forcing boys to have sex with us and yes manipulation is a form of force. No boy wants to be molested [by] an adult man until we convince them to do it. You may think these boys want this but in reality they only think that either out of fear (and I don't just mean threats, fear of disappointing someone they look up to) or by retraining their underdeveloped brains.” Desco even challenged the other men by noting “we like having sex with children. Just own it.”

The remainder of his history and characteristics are not particularly noteworthy. Desco is healthy (PSR 102), has some mental health issues (PSR ¶ 104), abused drugs and alcohol (PSR ¶¶ 106-07), dropped out of high school (PSR ¶ 109), and has sporadic work history (PSR ¶¶ 110-112).

**C. Seriousness of the offense, promotion of respect for the law, and just punishment for the offense, 18 U.S.C. § 3553(a)(2)(A)**

Sex crimes against children result in perpetual harm to victims and are therefore among the most serious prosecuted in the criminal justice system. As one district judge noted:

There can be no keener revelation of a society's soul than the way in which it treats its children. Given the current statistics, surrounding child pornography, we are living in a country that is losing its soul. Child pornography is a vile, heinous crime. Mention the term to your average American and he responds with immediate disgust and a sense of unease. However, once it enters the legal system, child pornography undergoes sterilization. The sterilization goes far beyond properly removing emotion from sentencing decisions. Images are described in the most clinical sense. Victims all too often remain nameless. The only emotions on display are those of the defendants, sorry that their actions were discovered by law enforcement.

*United States v. Cunningham*, 680 F.Supp.2d 844, 847 (N.D. Ohio, 2010), *affirmed* 669 F.3d 723 (6th Cir. 2012). Many offenders who collect and trade child pornography will attempt to deflect blame for their conduct by pointing to those who manipulate and sexually exploit children by their own hand. When they do so, they have individuals like Jostin Desco in mind. The marketplace of child pornography is full of images and videos of the suffering of children. People like Desco are the ones who populate that market.

At sentencing, the mother of MV-1 and MV-2 will appear to provide a victim impact statement. She will talk about the seriousness of the offense for her family, who are just one set of Desco's victims. By doing so, she will provide a voice to all

of Desco's other victims. Desco set them on a bumpy, windy road for the rest of their lives by his own, self-centered actions.

**D. Adequate Deterrence and Protecting the Public, 18 U.S.C. § 3553(a)(6)**

Deterrence has two parts in a case like this: specific deterrence and general deterrence. First, society needs to be protected from Desco. He has proven that the only meaningful way to prevent him from sexually exploiting children is by incarceration. Therapy did not help. A halfway house did not help. Parole conditions did not help. Desco's crimes also a variety of techniques. For example, by using the internet and social media platforms, Desco sexually exploited MV-2 through MV-9. Desco used the anonymity of the internet to sneak into these children's lives. From Michigan to Poland, from across the street to across the globe, Desco successfully exploited these kids from behind a screen. But for MV-1, Desco sexually assaulted the boy by his own hand. Desco snuck into his room to commit sex acts on the child. Thus, only when Desco is in prison can children be meaningfully protected from him.

General deterrence demands a significant sentence to inform other, like-minded offenders that conduct such as Desco's will be punished severely. Both Congress and the courts have recognized the high recidivism rates for these types of offenders. *See* Blaisdell, Krista, Note, *Protecting the Playgrounds of the Twenty-First Century: Analyzing Computer and Internet Restrictions for Internet*

*Sex Offenders*, 43 Val.U.L. Rev. 1155, 1192, n.150 (2009) (compiling congressional statements regarding the high risk of recidivism among child sex offenders); *Pugh*, 515 F.3d at 1201; *United States v. Allison*, 447 F.3d 402, 405-06 (5th Cir. 2006); *United States v. Garthus*, 552 F.3d 715, 720 (7th Cir. 2011) (“We need evidence-driven law just as we need evidence-driven medicine . . . statistical analysis of sex crimes has shown that the best predictor of recidivism is not deportment at an interview but sexual interest in children.”) (citations omitted). Thankfully, very few offenders measure up to Desco, whose conduct and history place him in the upper echelon of sex offenders. Deterring such individuals by imposing a large sentence is vital.

Both to protect the public and provide adequate deterrence, a guidelines sentence is called for in this case.

**IV  
Conclusion**

For the reasons above, the United States respectfully requests a custodial sentence of 60 years to be followed by five years of supervised release.

Respectfully submitted,

DAWN N. ISON  
United States Attorney

s/Kevin M. Mulcahy  
KEVIN M. MULCAHY  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, Michigan 48226  
(313) 226-9713  
[Kevin.Mulcahy@usdoj.gov](mailto:Kevin.Mulcahy@usdoj.gov)

Dated: February 28, 2022

**Certificate of Service**

I hereby certify that on February 28, 2022, I electronically filed the Sentencing Memorandum for the United States with the Clerk of the Court of the Eastern District of Michigan using the ECF system which will send notification of such filing to all counsel of record via electronic mail.

s/Kevin M. Mulcahy  
KEVIN M. MULCAHY  
Assistant United States Attorney